

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public
Works,

Defendants.

C/A No.: 7:23-cv-01427-TMC

**PLAINTIFF'S REQUEST
FOR PROTECTION**

R. Taylor Speer, counsel for Plaintiff, respectfully requests protection from this Court and discovery appearances from:

- January 30, 2024 through February 1, 2024 (out-of-state CLE);
- February 8, 2024 through February 12, 2024 (attend chemotherapy treatment of another);
- March 21, 2024 through March 25, 2024 (attend chemotherapy treatment of another);
- April 11, 2024 through April 15, 2024 (attend chemotherapy treatment of another);
- April 19, 2024 through April 23, 2024 (pre-paid travel);
- June 28, 2024 through July 9, 2024 (pre-paid travel); and
- August 14, 2024 through August 20, 2024 (pre-paid travel).

Defendant Gaffney Board of Public Works was advised of the content of this notice in advance of its filing and does no object to the request.

Respectfully submitted,

January 29, 2024

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